

KOSTELANETZ & FINK, LLP

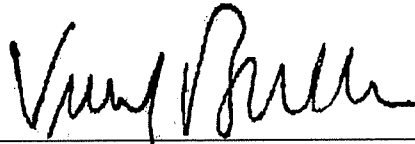
7 WORLD TRADE CENTER, 34TH FLOOR

APPLICATION GRANTED.

All deadlines in this case are stayed through 6/8/2020.

Chambers will mail a copy of this Order to pro se defendant Carl F. Marin at the address on the docket.

SO ORDERED:



Vincent L. Briccetti, U.S.D.J.
June 1, 2020

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Via ECF

Honorable Vincent L. Briccetti
United States District Judge
Southern District of New York
300 Quarropas Street, Room 1000
White Plains, New York 10604

Re: United States of America v. Marin, et al. (SDNY 18-9307)

Dear Judge Briccetti:

We represent Carla Marin and the Estate of Ana Beatriz Marin (collectively the "Estate Defendants") in the above-referenced action. The Estate Defendants write to respectfully request that the Court enter an order staying the Estate Defendants' deadline to respond to the United States' motion to appoint a receiver (the Motion) (Doc. No. 130) while the stipulation and proposed order of settlement ("Stipulation") (Doc. No. 157) remains pending before the Court.

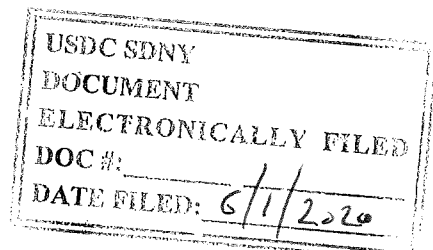
On February 14, 2020, the United States filed the Motion. The Court subsequently extended the Estate Defendants' response deadline three times to May 15, 2020. On May 12, 2020, the Estate Defendants notified the Court that the parties had reached a settlement in principle, at which point the Court entered a stay of all deadlines through May 22, 2020 to allow the parties to finalize their settlement agreement. (Doc No. 154). The Court subsequently extended that stay through May 29, 2020. (Doc. No. 156).

On May 29, 2020, the United States filed the Stipulation, which outlines a settlement agreement between the Estate Defendants, the United States, and the State of New York. We would respectfully request that the Court enter an order staying the Estate Defendants' deadline to respond to the Motion while the Stipulation is under consideration. While we are hopeful that the Court will enter the Stipulation, to the extent the Stipulation is ultimately denied, we would also request that the Court enter a briefing schedule on the Motion.

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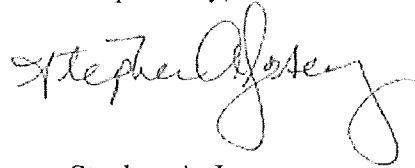
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The Estate Defendants have conferred with Defendant Carl Marin and counsel for the United States who consent to the requested relief.

Respectfully,

A handwritten signature in black ink, appearing to read "Stephen A. Josey". The signature is fluid and cursive, with a large, stylized "S" at the beginning and a long, sweeping tail that extends to the right.

Stephen A. Josey
Megan L. Brackney
sjosey@kflaw.com

cc:

Samuel Dolinger (*counsel for the United States*) (via ECF)
Carl Marin (via email)